



Electronic Frontier Foundation
Protecting Rights and Promoting Freedom on the Electronic Frontier

December 22, 2008

Bill of Costs Stayed until
2/6/09

Via Electronic Filing and Hand Delivery

The Honorable Susan Illston
United States District Court
for the Northern District of California
450 Golden Gate Avenue, 19th Floor
San Francisco, CA 94102

Re: Larry Bowoto, et al., v. ChevronTexaco Co. Case No. C-99-2506 SI
Request for Stay of Bill of Costs

Dear Judge Illston:

Plaintiffs write to request a stay of defendants' Bill of Costs (Doc. 2274) until after the determination of the pending Motion for New Trial (Doc. 2272), set for hearing on February 6, 2008. Plaintiffs asked defendants to stipulate to such a stay but defendants refused, offering only a short time extension over the holiday period.

Plaintiffs seek this stay because if their Motion for a New Trial is granted, defendants' Bill of Costs will be moot. Responding to defendants' Bill of Costs will be a complex, difficult process, necessitating, inter alia, getting declarations from various plaintiffs in Nigeria regarding their absolute inability to pay any costs awarded. Defendants seek a large amount of money from the plaintiffs, \$485,159.15. They seek it not only from the plaintiffs who were part of the recent trial, but also from plaintiffs whose claims have been dismissed for many years. Defendants will suffer no prejudice from this stay.

Because of the upcoming holiday, plaintiffs seek a determination of this request by December 24, 2008.

Respectfully submitted,

/s/Cindy Cohn
Cindy A. Cohn, Esq.
Attorney for Plaintiffs

